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Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Collier, Shannon & Scott 1055 Thomas Jefferson Street, N.W., Washington, D.C. 20007		2. Registration No. 3694								
3. Name of foreign principal The Australian Wheat Board	4. Principal address of foreign principal 528 Lonsdale Street Melbourne, Victoria 3000 Australia									
5. Indicate whether your foreign principal is one of the following type: <input type="checkbox"/> Foreign government <input type="checkbox"/> Foreign political party <input checked="" type="checkbox"/> Foreign or <input type="checkbox"/> domestic organization: If either, check one of the following: <table border="0"><tr><td><input type="checkbox"/> Partnership</td><td><input type="checkbox"/> Committee</td></tr><tr><td><input type="checkbox"/> Corporation</td><td><input type="checkbox"/> Voluntary group</td></tr><tr><td><input type="checkbox"/> Association</td><td><input checked="" type="checkbox"/> Other (specify) <u>Australian Statutory Corporation</u> empowered by the Commonwealth of Australia</td></tr><tr><td colspan="2"><input type="checkbox"/> Individual—State his nationality _____</td></tr></table>			<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee	<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group	<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (specify) <u>Australian Statutory Corporation</u> empowered by the Commonwealth of Australia	<input type="checkbox"/> Individual—State his nationality _____	
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<input type="checkbox"/> Individual—State his nationality _____										
6. If the foreign principal is a foreign government, state: a) Branch or agency represented by the registrant. b) Name and title of official with whom registrant deals.										
7. If the foreign principal is a foreign political party, state: a) Principal address b) Name and title of official with whom registrant deals. c) Principal aim										

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SECTION
REGISTRATION OF

N/A

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

Marketing of wheat and other grains grown in Australia and elsewhere, both in Australia and in major international markets.

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

Directed by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☒

Controlled by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

Financed by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐

Subsidized in whole by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☒


Subsidized in part by a foreign government, foreign political party, or other foreign principal..... Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

The Australian Wheat Board is a statutory corporation and as such was created by Australian statute. It is independently run and is financed by Australian growers of wheat and other grains.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

Date of Exhibit A	Name and Title	Signature
4/19/90	David A. Hartquist, Partner	

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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Name of Registrant

Collier, Shannon & Scott

Name of Foreign Principal

Australian Wheat Board

Check Appropriate Boxes:

1. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
2. ☒ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- See attachments
3. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Registrant has undertaken to represent the interests of the Australian Wheat Board in connection with Congress' consideration of a 1990 'farm bill'. This will involve visits to Members of Congress and their staff and to the Administration to explain the viewpoints of the AWB and the nature of its activities.

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Representation of the AWB before the U.S. Congress and Administration; Meetings with Members of Congress, their staffs and officials in the Administration. Explanation of the AWB's activities and why it would be injured in the event Congress adopts various proposed provisions as part of a 1990 farm bill. Registrant will request that Congress consider the adverse impact on Australia in formulating those provisions of the farm bill.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Representation of the AWB before the House and Senate Agriculture Committees, Members of Congress and their staffs; officials in the U.S. Department of Agriculture and Office of the United States Trade Representative. Explanation of the AWB's activities and why the AWB would be injured should the Congress adopt certain changes to the present Export Enhancement Program (EEP) as part of the 1990 Farm Bill.

Registrant will request that Congress adopt legislation requiring the Secretary of Agriculture to consider the effect of using the EEP on the Australian wheat industry.

Date of Exhibit B

4/19/90

Name and Title

David A. Hartquist, Partner

Signature

David A. Hartquist

¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Collier, Shannon & Scott
Attorneys-at-Law

Resident Counsel, Sydney
Patrick B. Fazzone*

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Sydney N.S.W. 2011
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*Admitted Washington D.C. Bar

Head Office

1055 Thomas Jefferson Street, N.W.
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April 17, 1990

Dr. Tim Ryan
Senior Manager
Marketing Strategy
Australian Wheat Board
528 Lonsdale Street
MELBOURNE, VICTORIA 3000

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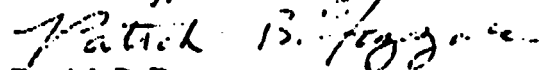
Dear Tim,

The purpose of this memorandum is to outline our proposed fee arrangement for our representation of the Australian Wheat Board before the United States Congress and the Administration. This arrangement would apply to our lobbying efforts in connection with (1) Senator Boren's unfair trading practices provision (adopted by the Senate Agriculture Committee as part of the Committee's farm bill); and (2) the Board's campaign to obtain language in the farm bill or its legislative history requiring the United States Department of Agriculture to take account of the effects on Australia prior to bestowing an export subsidy under the U.S. Export Enhancement Program.

As we indicated in our proposal to you dated April 2, 1990, our total fees for representing the Wheat Board in these two matters, during the period April - October, 1990, will be between US \$30,000 and \$50,000. (Obviously, these total fees would not apply in the event our early meetings suggested that it would be futile to proceed, as discussed in our April 2 memorandum.) Our billing will be on an hourly basis, with bills for our fees sent to you monthly during the course of our lobbying efforts. The hourly fee charged will be at the rates applicable to those lawyers and legislative representatives that assist in this matter. Finally, because we do not envisage the need for large outlays on our part early on in our campaign, we do not feel there is a need to request a retainer from the Board.

We at Collier Shannon & Scott look forward to assisting the Australian Wheat Board and to representing it before the United States Congress and Administration. Please do not hesitate to contact me if you have any questions or would like any additional information with respect to the fee arrangement outlined above.

Yours truly,



Patrick B. Fazzone
Resident Counsel, Sydney
Collier Shannon & Scott

cc. David A. Hartquist
Collier Shannon & Scott
Washington, D.C.

Collier, Shannon & Scott
Attorneys-at-Law

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April 2, 1990

Dr Timothy J Ryan
Senior Manager
Marketing Strategy
Australian Wheat Board
528 Lonsdale Street
Melbourne Vic. 3000

Dear Tim,

As we discussed, the purpose of this letter is to propose what we think would at this point be a viable and effective lobbying strategy for the Wheat Board in connection with 1990 U.S. Farm Bill and other related issues of concern to the Board. The letter also provides our estimate as to the likely cost of such a program.

A. Collier Shannon & Scott

As described in our letter to you of 15 December 1989, Collier, Shannon & Scott is a Washington D.C. based law firm with approximately 50 attorneys. Collier Shannon has one of the most developed and well-known legislative and regulatory practices of any U.S. law firm. A substantial part of our practice consists of representing clients before the United States Congress and Administration. Such representation includes the development of legislative strategies and the advocacy of clients' interests before key congressional committees, Members and their staffs. Our clients include a wide range of U.S. and overseas interests. Because of the diversity of our client base, the firm has been involved in the formulation of much of the major U.S. legislation in the past decade. The firm has been particularly involved in matters relating to agriculture and is currently representing several important U.S. industries in connection with Congress' efforts to enact a 1990 Farm Bill.

In addition to its 50 lawyers, the firm has a legislative division consisting of 6 legislative representatives. Each of our full-time legislative personnel has had extensive experience working on Capitol Hill, including on agriculture issues. This experience is invaluable both in formulating legislative strategy and in ensuring access to key decision makers and their staff on behalf of our clients.

In January 1989, the firm opened a Sydney, Australia office. As you know, I head up that office, which provides local assistance to Australian companies on matters involving U.S. law and the U.S. government. The office also provides a local point of contact for Australian clients which, we believe, permits us to better serve the needs of those companies.

B. Recommended Lobbying Strategy for the Australian Wheat Board.

As we have discussed, there are several related developments in the U.S. Congress which suggest the advisability of a focused lobbying strategy on the part of the Wheat Board. These include: (1) Congress' current debate as to whether and to what extent existing agricultural programs (including U.S. agricultural export subsidies) should be extended beyond their expiry date of September 1990; and (2) recent suggestions in testimony by U.S. wheat interests that Australian wheat selling practices have caused distortions in world wheat prices. In addition to these developments, it is possible that other issues may arise during Congress' ongoing deliberations on U.S. farm programs which may also be of concern to the Wheat Board.

The remainder of this letter outlines our proposed strategy for a lobbying effort on each of these issues. The letter assesses the advisability of such an effort, outlines what we believe is the optimum way of proceeding, and indicates the probable cost.

1. Lobbying With Respect to The 1990 Farm Bill.

a. Objectives

As you are well aware, the United States Congress is currently in the midst of formulating a 1990 Farm Bill to replace the current farm legislation by September 1990, which is when that legislation expires.

Thus far, most of the legislative activity has occurred in the House of Representatives. Last week, the House Agriculture Committee's Subcommittee on Wheat, Soybeans and Feed Grains began mark-up of proposed farm bill provisions. The Senate Agriculture Committee is not expected to begin work in earnest until mid to late May.

Among the most controversial programs being reexamined by Congress are the Export Enhancement Program ("EEP") and the Targeted Export Assistance ("TEA") program. As we are all well aware, these agricultural export subsidy programs have had a serious adverse impact on Australian wheat exports because they have often been applied to sales in markets in which unsubsidised Australian exports also compete. As we discussed, they have been used in ways not envisaged by the Congress when it created the subsidy programs in 1985. Nevertheless, there is likely to be strong pressure by U.S. farm groups against significantly altering or eliminating the programs.

With the relatively short period left to Congress to enact a new bill there may be considerable pressure simply to reenact the programs, particularly if there is no significant opposition. Some Members, for example, may prefer to delay reconsideration of the programs until after the conclusion of the GATT Uruguay Round. Of course, if the GATT parties are unable to reach a satisfactory consensus on agricultural issues, this approach will leave the subsidy programs in place until the next major revision to U.S. farm programs. Moreover, even if a GATT consensus is reached (the best case scenario) U.S. agricultural subsidies are likely to be phased down, not eliminated immediately. Until they are finally terminated, U.S. subsidies will still be applied to major overseas markets. In addition, the best case scenario assumes that U.S. farmers will accept a dismantling of the export subsidy programs. Evidence is emerging of strong support among farm groups for maintaining the current subsidy programs, despite their imperfections. Unless the Administration were able to persuade Congress to implement any Uruguay Round agreement, the current programs could well continue for the foreseeable future.

The danger for Australian interests is that the Congress will not curtail its subsidy programs and/or will continue to apply subsidies to sales in markets where Australian interests compete. It is our assessment that unless the Australian position is advanced in a concerted manner, subsidies will continue to be applied to the detriment of Australian interests for as long as the current programs remain in force.

As indicated in our letter of 15 December, it is our conclusion that the Wheat Board can have an impact on U.S. policy and decision making if it engages in periodic and well-placed lobbying activity of its own. We would suggest that our contacts and standing among Members of Congress and their staff make us ideally situated to assist in this regard. Any activity would, of course, be closely co-ordinated with the activities of the Australian government and would supplement those activities in a way designed to ensure that the Wheat Board's interests are not overlooked in U.S. decision making.

Such a supplementary effort would have two advantages. First, it would ensure that the Wheat Board's message was presented in a more concerted manner and on an ongoing basis. Second, the Wheat Board would benefit from our contacts and access on Capitol Hill. As you know, an organisation's ability to have its viewpoint heard in Congress and the Administration often depends on it having local representation with a high standing and access to the key decision makers. We do not know of a firm that has a better reputation and standing among the key agriculture decision makers than our own. Our standing and contacts would, we feel, increase the effectiveness of any campaign to influence government decision making and policy in this area.

While it is our opinion that a concerted, supplementary program is advisable, we do not believe that such an effort need involve an undue commitment of resources. Indeed, it is our opinion that such a program should be 'low-key' and avoid high profile activity. As we discussed, we believe that the most effective approach would be for the Wheat Board to engage in certain carefully focused activities designed to obtain maximum

benefit. Because the Wheat Board already has a "listening post" in Washington, it does not require additional "eyes and ears" to track up to the moment developments. Moreover, we see no need to mount a grass roots or other mass campaign to influence opinion in this area. Where the Wheat Board would benefit is from well-timed visits and conversations with key decision makers and staff to ensure that the Board's position and concerns are reflected in crucial decisions.

As we also discussed, it is important that such a program have well-identified and attainable objectives. It is, of course, unlikely that the Wheat Board acting alone could persuade Congress to abandon the export subsidy programs. However, there are more limited objectives that would also be quite beneficial to the Wheat Board and which are in our view attainable. One such objective would be to have language included either in the farm bill or in the legislative history (where Congress' intent is described in greater detail)* requiring the United States Department of Agriculture (USDA) to consider the impact on Australia prior to bestowing an export subsidy in any market in which Australian suppliers are also active. A similar provision was included in the Canada-U.S. Free Trade Agreement to accommodate the interests of Canadian exporters.

As I mentioned to you, we have been able to obtain similar results for the Venezuelan petroleum industry in the face of congressional proposals for a tax on oil imports. This example is particularly apt because the position of Venezuela and its key industries in relation to the U.S. government is similar to that of Australia. Both Venezuela and Australia are mid-sized nations that have important trade and defence relationships with the United States, but little U.S. constituent support. Our reputation and standing among key government decision makers have, we feel, enabled us to achieve the same types of results that we believe we can achieve for the Wheat Board.

Inclusion of favourable language in the farm bill or in its legislative history would be highly advantageous to the Wheat Board. It would ensure that USDA considered the Board's interests each time it contemplated the grant of an export subsidy. Equally important, it would serve as explicit recognition that export subsidies do adversely affect Australian interests. As such, this language would provide a very effective backdrop for the presentation of arguments to USDA against the application of subsidies where the Board would be adversely affected.

* As you know, the legislative history of U.S. statutes (eg., committee reports) plays a very important role in the interpretation of U.S. laws both by the courts and the U.S. administrative agencies.

b. Timing

The remaining major consideration is one of timing. Since our letter to you of 15 December 1990, Congress has actively begun consideration of farm legislation and mark-up has begun on the House side. While these developments have somewhat limited our ability to influence the debate in the House, we nonetheless believe that the objectives outlined above remain attainable. It has always been our judgement that our most likely supporters would be in the Senate and the U.S. Administration, due in large part to the highly parochial outlook of most Members of the House. (Indeed, in other matters for overseas interests we have focused our efforts almost exclusively in the Senate and Administration rather than the House.) Accordingly, it would be our strategy, through combined lobbying in the Senate and the Administration (principally the USDA and the U.S. Trade Representative), to have the desired legislative language included in the Senate bill, and ultimately, in the joint bill reported out of the House-Senate conference. Because the Senate has yet to begin serious deliberations, we believe there is still sufficient time to achieve this objective through a focused, concerted effort. However, it is also critical that such activity be initiated as soon as possible.

2. Lobbying with Respect to the Non-distortive Effects of Australian Wheat Pricing

As you know, U.S. wheat interests recently submitted testimony to Congress to the effect that Australia's wheat pricing practices are not based on free market factors but are in fact price distortive. A possible objective of this testimony was indirectly to justify use of U.S. export subsidies in markets in which Australian exporters are active.

In our view, it is advisable for the Wheat Board to pursue a 'low-key' lobbying effort to counteract any possible negative effects of this testimony. It is unclear whether Members have in fact been influenced by these statements. Nevertheless, if the issue is not clarified, the U.S. wheat interests' testimony could tend to "muddy the waters" and make it more difficult to persuade Members to agree to language favourable to Australia. Moreover, while the Wheat Board's letter in response to that testimony was undoubtedly very helpful in setting the record straight, we believe it is advisable to follow up to ensure that any negative effects of the testimony are counteracted.

In our view, the Australian pricing issue is related to the issue of the impact of U.S. subsidies. Accordingly, we believe that any efforts with respect to the pricing issue could be carried out as part of the overall effort to achieve language in the farm bill favourable to Australian interests. We also are confident that the issue raised by the U.S. interests can be clarified and that any potential negative impact can be counteracted.

3. Lobbying With Respect to Other Issues of Potential Concern

At this point, it is the above developments that are of principal concern to the Wheat Board. Nevertheless, it is possible that other issues may arise during Congress' consideration of the farm bill that would also be of concern to the Wheat Board. For example, proposals could be advanced that are intended primarily as "bargaining chips" for the Uruguay Round, that might also be detrimental to the Wheat Board's interests.* In our judgment, it is advisable to monitor developments at this stage carefully. In the event other issues of concern arise, serious consideration should be given to legislative activity as appropriate. Assuming those issue(s) related to the farm bill debate, such activity could be carried out as part of the overall effort.

C. Likely Cost of a Focused Legislative Effort

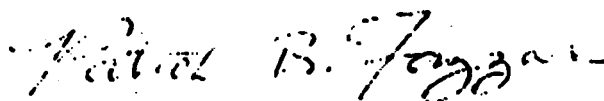
As I mentioned to you, the cost of a focused, supplementary legislative effort would be rather modest, especially in view of the potential benefits. Moreover, we believe that those benefits could be readily assessed following such an effort in view of the identifiable major objective (ie., inclusion of language requiring the USDA to consider the effect on Australia prior to granting any subsidy). We would estimate the total cost of mounting a campaign with respect to all of the issues outlined in section B above (during the period April through September, 1990) to be approximately US\$30,000 - \$50,000. This cost would include the preparation of position papers, the development of a legislative strategy and the implementation of this strategy through carefully timed visits and telephone conversations with the key decision makers and their staff.

We would also propose that all work be performed and evaluated in stages to avoid an undue commitment of resources by the Wheat Board if in fact the outlined objectives appear not to be attainable. Our first step would be to develop arguments, prepare a position paper and map out a legislative strategy. We then would hold initial meetings with Administration officials and key Members of Congress and their staffs. Following these initial meetings, we would evaluate the reaction to our arguments and position, and thus the likelihood ultimately of persuading Congress to accept our proposed language. If we conclude at that point or following subsequent rounds of meetings that there is in fact little ground for going further we would discontinue our efforts, thereby avoiding further expenditures by the Board.

* As you are aware, it is by no means unusual for legislation to be proposed for bargaining or coercive purposes. A good example is Senate Finance Committee Chairman Lloyd Bentsen's recent suggestion that congressional implementation of any agreement reached in the Uruguay Round be linked to progress in bilateral talks on market access between the U.S. and Japan.

I hope that this information will be of assistance to the Wheat Board in evaluating whether to approve a legislative campaign as part of its strategy with respect to the 1990 Farm Bill. Please do not hesitate to contact me if you have any questions or would like any additional information.

Yours truly,

A handwritten signature in dark ink, appearing to read "Patrick B. Fazzone". The signature is written in a cursive, slightly slanted style.

Patrick B. Fazzone